



CONNELLY CONTAINERS, INC.

RSPA - 1998 - 12607-1

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January 30, 1998

**Administrator
Research and Special Programs Administration
U. S. Department of Transportation
400 7th Street, SW
Washington, DC 20590-0001**

Dear Sirs:

We are petitioning the D. O. T. for a rule making change in the wording of 49 CFR 178.703 (a) (iv).

Summary

Marking of corrugated IBCs (11G) must now include the month and year of manufacture. Whereas, referencing 178.503 (a) (6), the marking of smaller corrugated containers (4G) calls only for year of manufacture. Whether large or small, all corrugated containers generally go through the same manufacturing process. The marking of the corrugated box is generally accomplished by printing with printing plates on a converting press. The existing marking requirement for 11G now requires completely new printing plates for each month of manufacture, twelve per year, while 4G containers, require new plates only once per year. Effectively, the cost of printing plates for 11G are increased by twelve. Our petition is to have 11G containers only require year of manufacture in their marking.

Suggested Wording Change of 49 CFR 178.703 (a) (iv)

We suggest the wording of 49 CFR 178.703 (a) (iv) be changed to:

“The month (designated numerically) and year (last two digits) of manufacture. Packagings of type 11G may be marked with only the year (last two digits) of manufacture.”

Petitioners Interest

Our interest is to reduce the costs associated with the purchasing of new printing plates each month versus each year. Costs include not only the cost of the printing plates, but also the related costs of mounting materials, print specification changes, and added paperwork to accommodate these monthly changes. The potential for marking error also increases as the number of changes increase. With this petition, we are only representing our own company. However, the same cost savings would apply to all 11G IBC manufacturers and the final users of these containers.

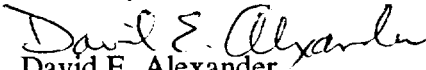
Information Supporting Proposal

Our thoughts are that the increased frequency of markings change on 11G containers versus 4G containers does not provide any added benefits, safeguards, etc., only added costs. Both containers classified as 11G and 4G go through an identical manufacturing process. Only the size of the container is the determinant. Even materials used in either 11G or 4G can be the same, stronger, or lighter; all acceptable as long as performance standards are met. Therefore, the differing requirements in date marking for each size has no substance.

With the proposed change, there would be cost savings to both the manufacturer and the user, as market forces would allow for lower pricing. The overall benefit to society would be a less costly alternative for cleanup and transportation of hazardous materials.

If you have any questions, please let me know.

Sincerely,


David E. Alexander
Vice President of Sales

DEA

cc: Mary McGinley
E. Agudelo